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Attorneys for Shield Securities Limited

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

LEHMAN BROTHERS HOLDINGS INC.,
et al.

Debtors.

Chapter 11
Case No. 08-13555 (SCC)

LEHMAN BROTHERS SPECIAL
FINANCING INC.,

Plaintiff,

- *against* -

BANK OF AMERICA NATIONAL
ASSOCIATION, *et al.*,

Defendants.

Adversary Proceeding
No. 10-03547 (SCC)

NOTICE OF APPEAL

Defendant Shield Securities Limited (**Shield**), by its undersigned counsel, hereby appeals pursuant to 28 U.S.C. §158(a) to the United States District Court for the Southern District of New York (the **District Court**) the Order Concerning Shield's Motion to Dismiss for

Lack of Personal Jurisdiction (the **Order**) of the United States Bankruptcy Court for the Southern District of New York (Hon. J. Chapman) (the **Bankruptcy Court**) entered on September 28, 2015 to the extent that by that Order the Bankruptcy Court asserts in rem jurisdiction and concomitant adjudicatory authority in the dispute. The Order and associated Memorandum Decision are attached as Exhibits A and B, respectively, to the Declaration of Shannon M. Leitner, filed on October 5, 2015. In filing this notice of appeal and related submissions, Shield does not waive and expressly preserves any and all defenses, including, without limitation, lack of personal jurisdiction (including, for the avoidance of doubt, both in personam jurisdiction over Shield and in rem jurisdiction over any asserted subject matter of this dispute).

The names of all parties to the decision appealed from, and the names, addresses and telephone numbers of their respective attorneys, are as follows:

APPELLANT:

Shield Securities Limited

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PLAINTIFF-APPELLEES:

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Dated: New York, New York
October 5, 2015

FRESHFIELDS BRUCKHAUS DERINGER US LLP

By: /s/ Timothy P. Harkness

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